



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Dennis H. Treacy Director

James S. Gilmore, III Governor

John Paul Woodley, Jr. Secretary of Natural Resources 5636 Southern Boulevard Virginia Beach, VA 23462 Tel# (757) 518-2000 http://www.deq.state.va.us

Francis L. Daniel Tidewater Regional Director

Fax (757) 518-2003 March 13, 2001

Mr. Jim Parsons
Environmental Manager
Perdue Incorporated
P.O. Box 158
Showell, MD 21862-0158



RE:

EPA ID #VAD980715312
Perdue Inc. - Accomac
Rte 13 (22520 Lankford Highway)
Accomac (Accomack County)

Dear Mr. Parsons:

On February 22, 2001, I conducted a RCRA Hazardous Waste Compliance Evaluation Inspection at the referenced facility. During the inspection it was noted that the facility is classified as a CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CEG) of hazardous waste. In addition, the facility appears to be in compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). The inspection survey and checklist are enclosed.

The facility was previously identified as a Small Quantity Generator (SQG) of hazardous waste in Department files. Based on current monthly hazardous waste generation amounts, and in accordance with your request, the facility's generator universe will be changed to CEG with this inspection report. No further notification is required.

Perdue currently uses solvent-based parts washer units in garage operations, as supplied and serviced by Safety-Kleen Systems of Chesapeake, Virginia. The removed solvent from the Safety-Kleen units is the only regular hazardous waste stream for Perdue. It is suggested that you consider switching to a non-hazardous or less-hazardous waste-generating alternative, such as

Mr. Jim Parsons March 13, 2001 Page 2 of 2

closed-loop units that recycle the cleaning solvent. Use of the closed-loop units would reduce the solvent waste stream significantly. The closed loop systems may generate no hazardous waste with the exception of bottom sludge. The sludge is slowly generated based on the amount of "dirt" on parts and, upon analysis, may be non-hazardous. There are also a number of aqueous or other solvent-based systems that do not generate a hazardous waste when spent (such as the Zep systems currently in use in the processing plant). [It is noted that with the current solvent-based system, generation of greater than 33 gallons per service (or per month) would place Perdue back into the small quantity generator universe.] Mr. Ron Pinkoski, of the Department's Office of Pollution Prevention, accompanied me on the recent site visit. Please feel free to contact Mr. Pinkoski at (757) 518-2007 for information on non-hazardous or less-hazardous waste generating parts washers and solutions.

Please contact me at (757) 518-2175 if you have any questions about the content of this letter or need additional guidance in achieving or maintaining compliance.

Sincerely

Lisa A. Lillis

Environmental Inspector Senior

Enclosures

c: Christian Braun, DEQ, OTA Ron Pinkoski, DEQ-TRO, OPP

File

DEPARTMENT OF ENVIRONMENTAL QUALITY

SURVEY SHEET FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY:

Perdue, Inc. - Accomac

ADDRESS:

Route 13 (22520 Lankford Highway)

Accomac, VA 23301 (Accomack County)

EPA ID NUMBER:

VAD980715312

FACILITY

REPRESENTATIVE:

James Eichelberger

TITLE:

Environmental Manager

TELEPHONE NUMBER:

(757) 787-5210

INSPECTOR'S NAME:

Lisa A. Lillis

TITLE:

Environmental Inspector Senior

DATE of INSPECTION:

February 22, 2001

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)

Chicken processor (Hazardous waste generated in garage operations.)

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

RQ waste combustible liquid, n.o.s. (petroleum naphtha) – D001/D018/D039/D040 (6.7#/gallon)

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
Pre-Autumn 2000	328 lbs (49 gal)	228 lbs (34 gal)
Post-Autumn 2000	194 lbs (29 gal)	194 lbs (29 gal)

NOTE: Prior to CY2000, the facility had three 30-gallon Safety-Kleen parts washer units. One unit was removed from service in the summer of 1999. Until the autumn of 2000, Safety-Kleen would sometimes service more than once a month or remove 34 gallons or more per month. Since autumn 2000, Safety-Kleen has removed no more than 33 gallons of spent parts washer solvent per month (average is 29 gallons). The facility will continue the service at this level to maintain quantities below the criterion for SQG. The facility will investigate non-hazardous waste alternatives.

Does the facility ever generate greater than:
 1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)?

NO

100 kg of clean up from a spill of P listed waste or F020-F023 and F026-F027 waste? If yes, then the facility is a large quantity generator.

NO

5. How is the waste presently being handled? Where is it sent? (List all transporters and facilities, or on-site treatment performed).

Transporter:

Safety-Kleen

EPA ID #ILD984908202 EPA ID #SCR000075150 Disposal Facility: Safety-Kleen Chesapeake, VA

EPA ID #VAD000737346

6. Does the facility generate any hazardous waste that is excluded from regulation? If **yes**, list the waste and the basis for exclusion.

NO

7. Does the facility:

Generate

Market

Burn

used oil that is burned for energy recovery? Underline or circle all that are applicable. (If the facility markets or burns used oil, fill out the Used Oil Checklist.)

NO

Does the generator of used oil to be burned for energy recovery (other than a Conditionally Exempt Small Quantity Generator) mix the used oil with hazardous waste? If YES, then fill out the Used Oil Checklist.

NO

Used oil is handled by Mid-States Oil, Baltimore, MD. Used oil is re-refined. Oil is sampled annually.

8. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these?

NO

If Yes, list the waste, where it is sent, and complete the Metals Recovery Checklist.

9. Does the facility **GENERATE**, transport, store, collect or reclaim spent lead-acid batteries? If **yes**, <u>Underline</u> or **circle** all that are applicable. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist**.

YES

Batteries are returned to the vendor for regeneration.

- 10. Based on the above, the facility is a:
 - a. CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR*
 - b. small quantity generator
 - c. generator
 - d. permitted or interim status TSD
 - e. unpermitted TSD (explain in comments section)
 - f. transporter
 - g. other: please explain_____

[Underline or Circle All That Are Applicable]

11. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

^{*}Based on current monthly generation quantities.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

Location Number of Containers Number of Tanks Capacity

(Not applicable to Safety-Kleen parts washer units and service contracts. No accumulation prior to off site transport.)

13. Comments:

(See cover letter to this report for additional details.)

14. Waste Management Flow Diagram:

(Sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

Only hazardous waste is generated from spent solvent in two 30-gallon parts washer units in the facility's garage. The plant uses a non-hazardous parts solution in the plant (Zep Dyna). No hazardous waste is generated from chicken processing, the quality assurance laboratory, or the wastewater treatment plant. (All parts of the chicken are either processed for sale or sent for rendering.) Antifreeze is reused. The plant has begun switching from fluorescent bulbs to sodium vapor bulbs. This switch is completed as bulbs expire. The plant is reducing the uses of CFC-aerosols and those in use are depleted before disposal of the empty container. All other plant chemicals or maintenance supplies (e.g., paint) are used until exhausted.

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR CHECKLIST

40 CFR CITATION	REGULATION	YES	NO	NA	NC
261.5	In order for HW from a CESQG to be excluded from full regulation, the generator shall comply with Section 262.11, HW determination. Has the generator determined if his waste is hazardous waste? NOTE: If CESQG accumulation at any time exceeds 1,000 kilograms, then it is a SQG!	х			
261.5(f) or (g)	2. The CESQG may treat or dispose of his waste in an on-site facility, or ensure delivery to an off-site facility, either of which is:	х			
	a. A permitted facility; or	Х			
	b. An interim status facility; or				
	c. A permitted, licensed, or registered municipal or industrial solid waste facility that is authorized to accept HW; or (If YES, complete the "Virginia State Specific Requirements" Checklist and attach copy of letters granting permission)				
	d. A facility which beneficially uses or reuses, or legitimately recycles or reclaims the waste; or				
	e. A facility which treats the waste prior to beneficial use or reuse, or legitimate recycling or reclamation.				

COMMENTS: (See cover letter and survey section to this report for additional details.)

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 10-31-91 GSA No. 0246-EPA-OT

Please refer to the Instructions for Filling Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

Date Received (For Official Use Only) 4 000

and Recovery Act). United States Environmental Protection Agency Installation's EPA ID Number(Mark 'X' In the appropriate box) C. Installation's EPA ID Number El. Subsequent Notification A. First Notification (complete item C) II. Name of Installation (include company and specific site name) FIA 8 III. Location of Installation (Physical address not P.O. Box or Route Number) 12 Street (continued) State ZIP Code City or Town 3 County Code County Name IV. Installation Mailing Address (See Instructions) Street or P.O. Box State ZIP Code City or Town Α C lo C V. Installation Contact (Person to be contacted regarding waste activities at site) Name (last) (first) E Job Title Phone Number (area code and number) VI. Installation Contact Address (See Instructions) A. Contact Address B. Street or P.O. Box Mailing Location State ZIP Code City or Town VII. Ownership (See Instructions) A. Name of Installation's Legal Owner AIR D Street, P.O. Box, or Route Number YAM **X.** ... City or Town State ZIP Code D 8 0 (Date Changed)

Nav Year C. Owner Type D. Change of Owner B. Land Type Indicator Month Phone Number (area code and number)

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Notification of Regulated Waste Activity

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United States Environmental Protection Agency

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ACKNOWLEDGEMENT OF NOTIFICATION OF REGULATED WASTE ACTIVITY

(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

VA0930715312

PERDUE INC - ACCOMAC 22520 LANKFORD HWY RTE 13 ACCOMAC , VA 23301 JAMES BICHELBERGER ENV EGR

INSTALLATION ADDRESS

22520 LANKFORD HMY RTE 13 ACCOMAC .VA 23301

EPA Form 8700-12B (6-90)